

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WHAM-O Holding, LTD. et al,)	
)	
Plaintiff,)	Case No.: 1:21-cv-00320
v.)	
)	Hon. Judge Robert M. Dow, Jr.
The Partnerships and)	
Unincorporated Associations)	Hon. Mag. Judge Jeffrey T. Gilbert
Identified on Schedule A,)	
)	
Defendants.)	

Motion for Extension of Time

NOW COME Defendants Leanus and HWGhhq7h (“Defendants”), by and through their undersigned counsel, and hereby move this Court to extend the time to file a response to the Complaint. In support of their motion, Defendants state as follows:

1. Plaintiffs filed their Complaint on January 20, 2021. [Dkt. 1].
2. Defendants were ostensibly served with process on February 12, 2021. [Dkt. 26].
3. Defendants have been substantively and quantitatively involved in settlement negotiations with Plaintiffs.
4. Despite their diligence, Defendants need a short additional time to settle, or exhaust the prospect thereof and respond to Plaintiffs’ Complaint.
5. This Court may, for good cause, extend the time by which Defendants’ response is due after the time has expired if Defendants failed to act because of excusable neglect. Fed. R. Civ. P. 6(b)(1)(B).
6. Defendants respectfully request this Court extend the date on which Defendants are to have filed response(s) to Plaintiffs’ Complaint, if ultimately necessary, to April 12, 2021.
7. This Motion has been filed in good faith and is not interposed for purposes of delay.
8. This is the first motion for an extension of time filed by Defendants.

9. Plaintiffs have requested whether Plaintiffs would oppose the requested extension. As of the filing of this motion, Plaintiffs have not indicated whether they oppose Defendants' requested extension.

WHEREFORE, for the foregoing reasons, Defendants respectfully request that this Honorable Court enter an Order:

- a) extending the date on which Defendants' response(s) to Plaintiffs' Complaint are due to April 12, 2021.

Dated: March 22, 2021

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